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WILLIAM H. LINDNER, SECRETARY

Information Technology Program

June 12, 1998

Federal Communications Commission
1919 M Street N.W.
Washington D.C. 20554

Re: WT 96-86. Petition of the National Public Safety Telecommunications Council for Further Rulemaking to Allocate Spectrum in the 138-144 MHz Band for Public Safety

COMMENTS OF THE STATE OF FLORIDA

1. The State of Florida, Bureau of Wireless Communications, submits these comments in response to the above referenced matter. As a licensed user of public safety spectrum, and an agency with regulatory responsibility for other state and local public safety agencies within Florida, we are acutely aware of the need for additional spectrum below 800 MHz and have strong interests in this proceeding.
2. Many public safety agencies within Florida have benefited from 800 MHz allocations available to public safety, and look forward to further improvements as the newest allocations in the 746-806 MHz band becomes available. These agencies have generally been those in the largest municipal areas where funding is greatest and the technological improvements available in 800 MHz are most cost effective. We commend the Commission for its efforts in response to these public safety needs.
3. Many other public safety agencies however depend solely on spectrum below 800 MHz, and have neither the funding nor incentive to implement systems in 800 MHz. These agencies are generally those with less than a few hundred users but with large and mostly rural coverage areas, such as county sheriffs. Most of these users rely on frequencies in the VHF High Band (150-160 MHz) which were originally authorized twenty or thirty years ago. As the certified frequency coordinators can attest, additional VHF High Band channels were largely exhausted by about 1980, although many agencies remain in desperate need of additional spectrum in this band.
4. Public safety agencies using VHF High Band channels find that the large coverage areas obtainable from single-site systems, combined with the excellent performance of these channels in wooded, rural areas make this band much more desirable and cost effective than either the UHF or 800 MHz bands. We expect that large numbers of these users will continue to use VHF High band frequencies for the foreseeable future.

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Federal Communications Commission

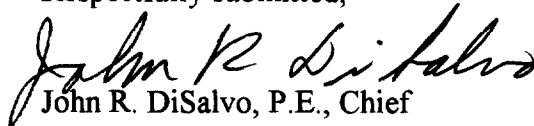
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5. An allocation of a portion of the 138-144 MHz band, such as 3 MHz, to public safety would alleviate not only channel congestion, but also many of the other difficulties faced by public safety users in this band. Such an allocation would allow further pairing of channels so that outmoded simplex systems could be replaced with mobile-relay systems. The additional spectrum would also allow sufficient room to enable practical transition plans for migration to narrowband systems in accordance with "spectrum refarming". Most of the VHF High Band spectrum within Florida is so tightly packed that neither expansion nor technological migration is possible without new spectrum.

6. For all of the reasons expressed above, and on behalf of state and local public safety agencies throughout Florida, we urge the Commission to undertake all steps necessary to allocate a minimum of 3 MHz of the 138-144 MHz band for exclusive public safety use.

Respectfully submitted,



John R. DiSalvo, P.E., Chief
Bureau of Wireless Communications
Information Technology Program
Department of Management Services
State of Florida

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cc: Governor Lawton Chiles
Senator Connie Mack
Senator Bob Graham
Linda Nelson